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November 29, 2017

Honorable Richard J. Sullivan
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Pasquale Maiorino, et al., 16-CR-522 (RJS)

Dear Judge Sullivan:

This letter and the accompanying correspondence are respectfully submitted on behalf of Pasquale Maiorino in the hope that they might assist the Court in arriving at a just and fair sentence. I believe that the letters submitted by his friends and family demonstrate that Mr. Maiorino has the capacity to be a loving father, devoted husband, and generous friend. It is the fact that his actions in this case have let these people down that haunts him and defines his remorse.

As a nineteen-year-old, he committed a horrible crime and was sentenced to a lengthy term of imprisonment. He has regretted that act every day since, and he is deeply remorseful for causing the death of another person. In serving that prison term, he was determined to better himself by getting an education and using that time productively.

In the instant case, approximately six years prior to the conduct at issue, Mr. Puleo agreed to build a deck on Mr. Maiorino's home. Mr. Maiorino paid \$40,000.00 to Mr. Puleo. Mr. Puleo performed approximately \$10,000.00 worth of work, left the job, and kept the unearned balance of \$30,000.00. In the ensuing six years, Mr. Maiorino made no attempt to recover his money. It was only after he was approached by Mr. Rubeo, acting on behalf of the government, that Mr. Maiorino accepted Mr. Rubeo's offer to collect the money. Admittedly, Mr. Maiorino knew that Mr. Puleo would be threatened and he accepted that extortionate means would be employed. Mr. Maiorino has accepted responsibility for this conduct by pleading guilty. Therefore, we submit this background, not as a defense or even an excuse, but as circumstances that the Sentencing Guidelines do not address. We recognize that while it is illegal to use extortionate means to

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collect an otherwise legal debt, we believe it is significant that the debt arose from Mr. Puleo's misappropriation of the money.

Finally, we would like to thank the Court for releasing Mr. Maiorino on bail so that he could address his dental issues. As can be seen from the dental reports, great progress has been made in resolving the problem.

Respectfully,

s/Charles F. Carnesi

cc: Government Counsel (via ECF)